

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
DALLAS DIVISION

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UNITED STATES OF AMERICA

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v.

NO. 3:09-CR-210-B

JESSE WILLIAM MCGRAW (1)  
also known as Ghost Exodus

**UNOPPOSED MOTION TO CONTINUE SENTENCING DATES AND DEADLINES**

TO THE HONORABLE JANE J. BOYLE, UNITED STATES DISTRICT JUDGE:

Defendant, Jesse William McGraw, by his undersigned attorney, files this *Unopposed Motion To Continue Sentencing Dates And Deadlines*.

As grounds, Defendant would show this Honorable Court as follows.

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On August 4, 2010, the Defendant filed a Motion For Extension Of Time To File Presentence Investigation Report Objections (doc #58). On the same date, the Government filed her Government's Motion To Continue Sentencing Deadline (doc #56). On August 6, 2010, this Court signed an order granting defense counsel's motion to continue the deadline for presentence investigation report objections, and provided that the deadline for filing objections would be reset by separate order (doc #61).

Defendant Jesse William McGraw respectfully requests that the Court continue any and all sentencing dates and deadlines, including the sentencing hearing date, pending the Court's consideration of the matters herein. Defendant Jesse William McGraw respectfully requests that the sentencing dates and deadlines would be reset by separate order at a later time.

The undersigned counsel for Defendant has just recently been appointed and requires adequate time to investigate the case and learn the facts. The requested relief is necessary for the provision of effective assistance of counsel to the Defendant.

**PRAYER**

WHEREFORE PREMISES CONSIDERED, Defendant Jesse William McGraw respectfully requests that the Court continue the sentencing dates and deadlines.

Defendant prays that he receive all relief requested herein and all relief to which he is entitled to under the laws and the Constitution of the United States of America

Respectfully submitted,



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Todd A. Durden  
State Bar No. 06276680

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Attorney for Jesse William McGraw

**CERTIFICATE OF CONFERENCE**

I certify that on August 11, 2010, I conferred by telephone with the attorney for the government, AUSA Candina S. Heath, and that this motion is unopposed.



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Todd A. Durden

**CERTIFICATE OF SERVICE**

I certify that on August 11, 2010, I electronically filed the foregoing document with the Clerk of Court for the United States District Court, Northern District of Texas, using the electronic case filing (ECF) system of the Court, and thereby served it on all counsel of record in this case.



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Todd A. Durden